

FROM:

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TO:

Danny Tippy and Brent Ralston
Prineville BLM
3050 NE 3rd street
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DATE: May 27, 2003

SUBJECT: ONRC comments on the EA for the Little Canyon Mountain Fuel Reduction Project

Dear BLM:

Please accept the following comments from Oregon Natural Resources Council concerning the Little Canyon Mountain Fuel Reduction Project EA dated April 2003. ONRC represents over 7,000 people who support ONRC's mission to protect and restore Oregon's wildlands, wildlife and waters as an enduring legacy. Please send us a copy of Appendices D, F, I, M, N, P, and Q. Also, please send us copies of the applicable timber management plan and wildlife management plan that are referred to in the John Day RMP, and the mule deer winter range monitoring results required in the RMP.

1. There are several things about this EA that we like: the broad range of alternatives, the recognition that fuel reduction efforts are never complete and must be maintained by future prescribed fire, the recognition that fire hazard is increased by opening up the canopy and allowing young trees and brush to grow (EA page 107),

2. ONRC supports careful fuel reduction efforts to protect communities and careful restoration of degraded ecosystems, but we are very wary of fuel reduction and restoration that is implemented through traditional timber sales. There is too much incentive to take the bigger trees and create more problems than it solves from both a fuel perspective and an ecological perspective.

3. The BLM should mix and match parts of the different alternatives to arrive at a acceptable proposal:

a. The LCM project should focus on reducing fuels in the community zone within ½ mile of communities with more than 250 people per square mile. The BLM should also be working with private landowners to take firewise steps to protect their homes and other structures.

b. Outside the community zone the BLM should be focusing on the following activities: (a) reducing the extremely high road density, (b) removing small material less than 12 inches in diameter in selected locations (mostly Ponderosa pine ecosystems, (c) reintroducing fire, (d) controlling OHV use, (e) stop diversion of the irrigation ditch and

mud-bogging in the pit, (f) protect the values of the Strawberry Mountain Wilderness and any other areas without roads, (g) replace or remove culverts that block fish passage,

4. The ecological and hydrological costs of commercial logging with heavy equipment far outweigh the fuel reduction benefits. This is because the BLM cannot hope to control fire at the landscape level which is what they appear to be trying to do in this project. Without a doubt, at some point in the future, there will be an extreme fire event during extreme weather conditions and nothing the BLM does to treat these stands will significantly change the outcome of near complete loss of canopy. Given the reality that logging is largely ineffective, we can conclude that logging is largely unnecessary, so we do not have to accept the ecological costs of logging. The only exception to this is that the BLM should cooperate with the local community to take steps to protect houses by conducting treatment in the community zone. Jack Cohen's research clearly shows that firewise modifications to the structures themselves (metal roofs, etc) and treatment of immediately adjacent areas is all that is really required to protect homes.

5. The EA must better address the possibility that this project will actually increase fire risk and fire hazard:

- a. by increasing road access and human ignition risks,
- b. by creating activity fuels which may or may not get treated,
- c. by removing large trees which are least likely to burn,
- d. by decreasing canopy closure and shade, thereby drying out ground fuels and increases growth of brush.

6. The 1898 historic snapshot of vegetation conditions is highly questionable. This picture was taken at one time in a long cycle of climatic and vegetational dynamics. The conclusion that juniper was not a significant part of the ecosystem is highly questionable. The BLM has not adequately addressed the possible origins of this historic picture in relation to logging, mining, grazing, anthropogenic fires (both native and European), etc.

7. The EA should have better disclosed the timber volume to be removed and the size of the larger trees to be removed. The public and the decision-maker need to know this information to evaluate the impacts.

8. The EA should also have identified a preferred alternative to help the public focus their comments.

9. The FONSI should not have been signed. The decision-maker must take public comment before signing the FONSI. In this case the project will have significant impacts and an EIS should be prepared. Significant impacts include: soils, failure to maintain and improve mule deer winter range, extremely road density, fuel reduction that is ineffective control of fire at the landscape level, current and future loss of snag habitat, expanded use by OHVs, cumulative effects on hydrology (e.g. peak flows),

10. 85% of Little Canyon Mountain is crucial winter range for Mule deer, but the EA fails to indicate what the management requirements from

the RMP and fails to disclose the impacts to mule deer. Loss of hiding cover and loss of crown closure for snow interception, and lack of secure areas free of human disturbance are significant issues here, especially with all the existing roads.

Key ungulate winter ranges play a disproportionately large role, given their localized size and distribution, in maintaining the overall productivity of regional ungulate populations. These ranges ensure that a significant proportion of the breeding population survives to the next year. Females not only have to survive, they have to be in good enough shape in the spring to produce a healthy new crop of young. Human activity within and adjacent to key wintering areas adds stress and increases energy drain for animals. They may be forced to move about more than normal and even relocate to less favorable habitat. This becomes an increasingly significant factor as winter progresses. Temporary and permanent road and OHV access exposes animals to additional non-industrial disturbances and to greater pressure from predators.

Oregon_s Mule Deer Management Plan (ODFW, February 2003) says:

Issue 3. Mule deer habitat should be maintained and enhanced in all WMUs to keep deer populations at or near identified management objective levels.

Objectives:

- 1) Identify habitat conflicts and determine solutions.
- 2) Protect winter range and other critical habitat areas in all WMUs.

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Proposed Strategies:

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- 2) Identify limiting habitat factors in each WMU.
- 3) Protect and improve existing winter range areas &

&

Issue 6. The increasing and indiscriminate use of all-terrain vehicles (ATVs) and similar recreational vehicles during all periods of the year are of concern to the majority of hunters and land managers.

Objectives:

&

- 3) Encourage federal land managers to develop ATV rules that restrict use on winter range areas and other critical habitat areas.

<http://www.dfw.state.or.us/ODFWhtml/InfoCntrWild/PDFs/MuleDeerPlanFinal.PDF>

BLM appears to be falling far short of its duty to properly manage this crucial winter range area.

11. The John Day RMP says almost nothing about mule deer winter range except that it must be monitored for _habitat changes_ and that mule deer winter range must be _monitored, maintained, and improved._ The EA lacks information on monitoring results over the last 18 years and fails to disclose or analyze how this proposed action will maintain or improve winter range.

12. The 1985 John Day RMP/ROD is an outdated and inadequate management plan and should not be used to guide management. The RMP lacks any really management requirements and amounts to merely a long list of things to consider.

13. The EA says there is an active goshawk nest in the area, but does not say where it is or if the BLM even knows. The RMP says that human activity must be restricted near active raptor nests. The BLM must find and protect this nest and others.

14. The EA fails to disclose the cumulative impacts on soils. The existing level of soil disturbance and compaction must be disclosed and added to the soil disturbance expected from this project and any future projects. With this areas history to excessive road construction, mining, grazing, logging, OHVs, and fire. Soils are a significant issue.

15. There are also significant undisclosed cumulative effects that will be exhibited in the form of earlier snowmelt, run-off and peak flows. The combination of high road density and reduced canopy closure will cause significant cumulative effects including peak flows that erode stream banks and scour fish eggs which are harmful to protected steelhead and cutthroat trout. The EA does not discuss this significant issue.

16. The EA does not adequately describe the effects on species dependent upon snags. Current guidelines for snag retention are inadequate to provide for viable populations and prevent trends toward ESA listing of many species. The EA mentions the DECAID snag model but does not explain its relevance. The EA proposes to remove dying trees that should be retained for future snag habitat.

17. The EA says there is no lynx habitat, but in light of the recent decision in ONRC v. USFS and the clear need for NEPA analysis of the regional lynx mapping criteria, this finding needs more discussion. This area may be part of an important lynx travel corridor.

18. The EA needs to do a very thorough analysis of the risk that opening up the forest will lead to expansion of OHV use and degradation of soil, water quality, plant communities, wildlife requirements, etc. This an important cumulative effect issue. The EA admits that there is likely to be a future increase in OHN use, but there is absolutely no disclose or analysis of the ecological effects of this increase.

19. The John Day RMP calls for expanding the range of steelhead by replacing or removing culverts that block fish passage. This should be part of all the action alternatives.

20. Juniper may well have been a significant part of the ecosystem here at various times in history. It may have been affected by climatic cycles, native burning, and grazing, and we should not conclude so readily that juniper is undesirable and take such aggressive steps to eliminate it.

The scientific basis for juniper control is highly questionable. Juniper will take care of itself after you remove livestock and reintroduce fire.

"Many ranchers, rangeland managers, and range scientists in the Pacific

Northwest consider western juniper (*Juniperus occidentalis* Hook.) to be an invading weed that reduces water infiltration, dries up springs and streams, increases erosion, reduces biodiversity, and reduces the quality and quantity of forage for livestock and wildlife species. Although there is little scientific evidence supporting most of these beliefs, they are currently being used as rationales for controlling juniper on public and private lands. Similar views were held about pinyon-juniper woodlands in the Southwest and Great Basin from the 1940's through the 1960's, when efforts were also made to control woodland expansion.

"Pressures to control the further spread of western juniper and reduce its density in woodlands are increasing. Because of the paucity of information on the environmental effects of western juniper expansion in the Northwest, this paper primarily reviews evidence from earlier studies of pinyon-juniper woodlands in the Southwest and Great Basin. These studies rejected similar assumptions about the deleterious effects of pinyon-juniper expansion on ecosystem properties and call into question current rationales for controlling western juniper in the Northwest. These studies also suggest that while the expansion of juniper might alter species composition and decrease herbaceous biomass in grasslands and shrublands, they have few detrimental effects on streamflow, aquatic organisms, soil properties, or wildlife habitat.

" . . . while the expansion of juniper might alter species composition and decrease herbaceous biomass in grasslands and shrublands, they have few detrimental effects on streamflow, aquatic organisms, soil properties, or wildlife habitat. . . . [P]opular conclusions about junipers ignore many of the complexities of natural ecosystems, including the following:

- "1. In arid and semi-arid climates, most snow- and rain-water simply recharges the soil column; little excess is available to move downslope to streams (Hibbert 1983, West 1984),
- "2. Herbaceous plants and shrubs that replace trees also intercept rain and snow, reducing the amount of water reaching the ground;
- "3. Replacement plants also transpire and deplete soil water (Clary et al. 1974, Brown 1987a);
- "4. Tree removal exposes the soil and understory plants to direct sunlight, causing elevated temperatures and increased evapotranspiration (Clary et al. 1974, Everett and Sharrow 1985);
- "5. Tree removal exposes soils and understory plants to more wind, which increases evapotranspiration (Everett and Sharrow 1985); and
- "6. In areas where water is in excess of that needed to recharge the soil, this water may go to shallow aquifers rather than to streams (Hibbert 1983).

"In other words, studies showing that junipers intercept precipitation and transpire water (Young and Evans 1987, Eddleman and Miller 1992) cannot be used to conclude that this lost water would have ended up in streams and springs. To do so, water budgets of juniper-dominated and juniper-free sites would have to be compared, or long-term changes in streamflow following juniper removal measured.

A. JOY BELSKY, Viewpoint: Western juniper expansion: Is it a threat to

arid northwestern ecosystems? Journal of Range Management 49:53-59
January 1996, pp. 53-59. <http://www.onda.org/Archives/BelskyJuniper.html>.

A significant portion of the nutrients in juniper-rangeland ecosystems are contained in the Juniper trees. Cutting and removal of the juniper trees can cause long term depletion of the critical nutrients.

Livestock, by annual elimination of herbaceous cover, can cause many of the same effects as juniper encroachment, and many other effects that are far more deleterious. We propose the agency remove livestock and reintroduce fire before controlling juniper. By removing livestock maybe the herbaceous component can increase enough to carry fire and kill some of the juniper trees to reestablish a mosaic of fire driven seral development.

An EIS should be prepared to discuss whether removing livestock, reintroducing fire, and removing roads would be as effective or more effective than juniper control in restoring hydrologic function, fire ecology, and vegetation composition.

Please be sure to timely notify ONRC of the final decision on this project.

Sincerely,

/s/

Doug Heiken
ONRC

I have a few supplemental comments that came to me after I sent the comments yesterday:

A) ONRC shows that a significant portion of Little Canyon Mtn is uninventoried roadless and partially contiguous with the Strawberry Mtn wilderness, i.e. you can walk from LCM to SMW without crossing a road. I will fax you a map showing the roadless area as identified by ONRC. Please help us identify any roads that are in the roadless area and not reflected in our inventory.

Roadless areas greater than about 1,000 acres, whether they have been inventoried or not provide valuable natural resource attributes that must be protected. These include: water quality; healthy soils; fish and wildlife refugia; centers for dispersal, recolonization, and restoration of adjacent disturbed sites; reference sites for research; non-motorized, low-impact recreation; carbon sequestration; refugia that are relatively less at-risk from noxious weeds and other invasive non-native species, and many other significant values. See Forest Service Roadless Area Conservation FEIS, November 2000. This project involves activities in such unroaded areas. The NEPA analysis for this project does not adequately discuss the impacts of proposed activities on all the many significant values of roadless areas.

Recent scientific literature emphasizes the importance of unroaded areas greater than 1,000 acres as strongholds for the production of fish and other aquatic and terrestrial species, as well as sources of high quality water. Henjum, M.G., J.R. Karr, D.L. Bottom, D.A. Perry, J.C. Bednarz, S.G. Wright, S.A. Beckwitt and E. Beckwitt. 1994. Interim Protection for Late-Successional Forests, Fisheries, and Watersheds: National Forests East of the Cascade Crest, Oregon and Washington. A Report to the Congress and President of the United States. Rhodes, J.J., D.A. McCullough, and F.A. Espinosa. 1994. A Coarse Screening Process for Potential Application in ESA Consultations. Technical Report 94-4. Prepared for National Marine Fisheries Service.

Also, consider the conclusions and recommendations of the Road Density Analysis Task Team:

"Unroaded and low road density areas potentially represent areas in which the aquatic ecosystems are still operating with minimal human disturbances. Areas like these that provide for high quality habitat and stable fish populations are important refugia and a cornerstone of most species conservation strategies.

...

"Even well engineered roads act as conduits for sediment (Filipek 1993). Lee et al. (1997), also note that although improvements in road construction and logging methods can reduce sediment delivery to streams, sedimentation increases are unavoidable even when using the most cautious logging and construction methods.

"As stated in the Biological Opinion for bull trout (USFWS 1998), there is no positive contribution from roads to physical or biological characteristics of watersheds. Under present conditions, roads represent one of the most pervasive impacts of management activity to native aquatic communities and listed fish species.

...

"RDAT Recommendation (4): The Regional Executives provide direction to the field units that allow for road construction in undesignated low road density areas only after completion of the mid/fine scale analysis of these areas.

"Regional Executive Decision: While we agree that avoiding road construction in low road density areas with high to very high fish values may be desirable, we also recognize that providing direction precluding such development could conflict in some instances with our legal obligations under laws such as the Alaska National Interest Lands Conservation Act (ANILCA) and the 1872 Mining Laws. Rather than totally precluding such development, the BLM State Directors and Regional Foresters, through this transmittal letter, direct field units as follows:

"A. Avoid new road construction in low road density areas to the extent practical, consistent with existing authorities and LRMPs, but keep in mind that in some cases the need to remove hazardous fuels may be paramount for long term watershed restoration,

"B. Decisions to allow new road construction in low road density areas should not be made without an assessment of environmental effects,

including any changes to the value of the low road density area as a current or potential stronghold for listed aquatic species. This assessment and/or analysis should also consider the amount of acreage within the watershed already in Wilderness and inventoried roadless areas, and

"C. Where new road development in low road density areas cannot be avoided, road location and design should minimize effects to aquatic resources and incorporate practical mitigation measures, including closure or decommissioning of the road if the need for the road is temporary.

QUOTED FROM: Land Management Recommendations Related to The Value of Low Road Density Areas In the Conservation of Listed Salmon, Steelhead, and Bull Trout: A Commitment made as part of the Biological Opinions For Chinook Salmon and Steelhead (Snake River and upper Columbia River) and Bull Trout (Columbia and Klamath Rivers-areas not covered by the Northwest Forest Plan); Final Report; January 30, 2002; Prepared by the: Road Density Analysis Task Team.
<http://www.blm.gov/nhp/efoia/or/fy2002/ib/ib-or-2002-134.htm>

The roadless character of LCM is a significant issue that should be addressed in an EIS.

B) WEEDS: On Earthday 2003 Forest service Chief Dale Bosworth said that more attention needs to be paid to beating back invasive species. Opening up the canopy and disturbing the soil through road building and logging as proposed in this project could spread non-native weeds far and wide. The invasive weed sites in the analysis area and along all log and gravel haul routes should be fully inventoried and documented as part of the NEPA process for this project . In the absence of valid and complete weed survey information, harvest and road and fuel treatment activities planned as part of this project might exacerbate the problem instead of contain it.

We find it highly unlikely that conducting ground disturbing activities over so many acres of this planning are will not make the weed problems worse instead of better. The fact that logging will open up the forest and will likely allow a long-term expansion of OHV use makes this issue even more significant. These weeds are "a slow motion explosion" that should not be taken lightly. It is often better to just close roads and avoid ground disturbing activities while sending crews in to do hand-pulling of weed infestations as necessary.

Sincerely,

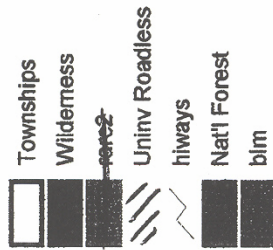
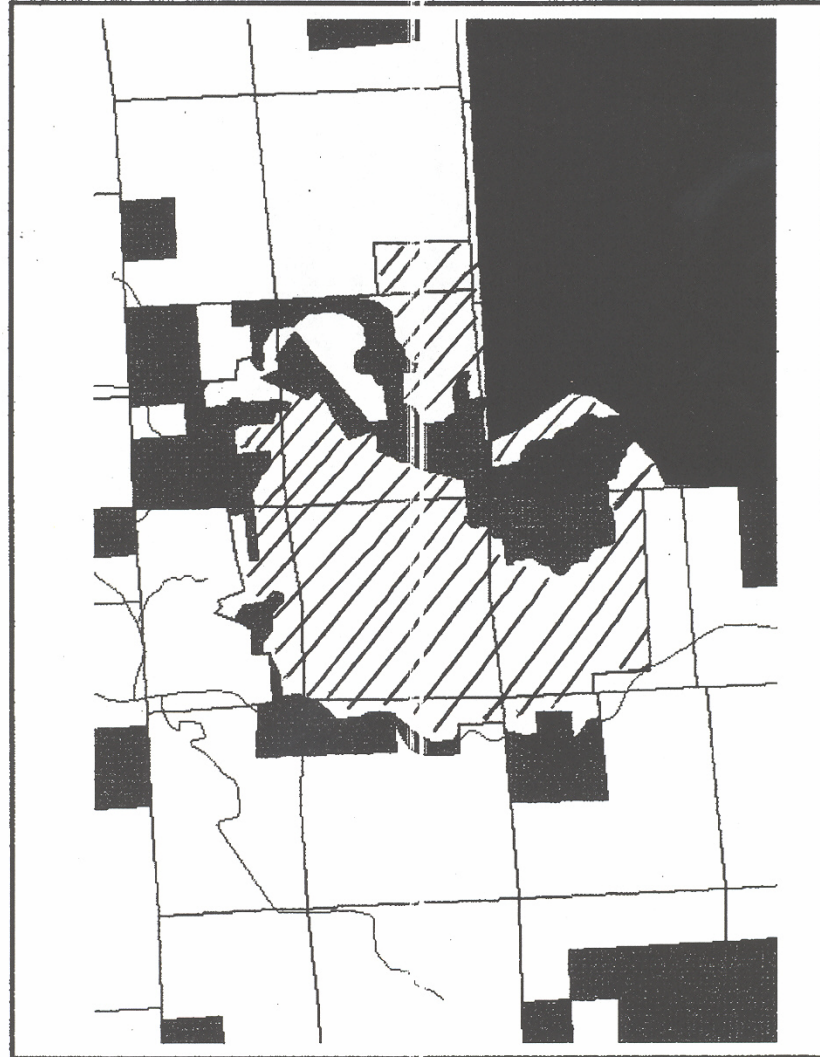
/s/

Doug Heiken
ONRC

ESRI ArcExplorer 2.0

ONRC Roadless Inventory

Little Canyon Mtn Fuel Reduction Project - Prineville, BLM



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Tuesday, May 27 2003

